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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JACQUELYNN NICKLER

Plaintiffs,

CASE NO.: 14-cv-1907-APG-CWH

VS.

COUNTY OF CLARK, organized and of the existing under the laws of State of Nevada; STEVEN D. GRIERSON, court administrator, individually; KATHLEEN LAMBERMONT, administrator of the Clark County District Attorney's office, individually; and, DOE 1 through 10, inclusive;

Defendants.

**STIPULATION AND ORDER TO EXTEND PLAINTIFF'S RESPONSE TO
DEFENDANT STEVEN GRIERSON'S MOTION TO DISMISS**

Pursuant to LR 6-1, Plaintiff, Jacquelynn Nickler, by and through her counsel of record Cal J. Potter, III, Esq. and C. J. Potter, IV, Esq. of Potter Law Offices; Defendant, Steven D. Grierson, by and through his counsel of record Frederick J. Perdomo, Deputy Attorney General; and Defendants, Clark County and Kathleen Lambergmont, by and through their counsel of record, Robert. W. Freeman, Esq. and Cayla Witty, Esq. of Lewis Brisbois Bisgaard & Smith, hereby stipulate and request that the scheduled date of filing of Plaintiff's Response to Defendant Steven Grierson's Motion to Dismiss [doc. 12] and Joinder [doc. 18], currently due on Friday, March 6, 2015, be extended twenty (20) days up to and including Thursday, March 26, 2015.

1 Plaintiff submits that good cause exists for this extension as Plaintiff's counsel, in
2 addition to working on this response, has been preparing a post-conviction writ that cannot be
3 extended, had three (3) depositions and four (4) day-long mandatory settlement conferences, in
4 addition to other deadlines and appearances since the time Defendant filed his Motion.
5 Additionally, next week, Plaintiff's counsel has five (5) depositions and numerous criminal
6 appearances.

7 Based upon the foregoing, the parties request that this Court order the time for the
8 Plaintiff to file her response to the Motion to Dismiss [doc. 12] and Joinder [doc. 18] to
9 Thursday, March 26, 2015. The parties also request that this Court provide a concomitant
10 enlargement of time for the Defendant's Reply thereto.

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This is the first request for enlargement of time is made in good faith and not for the purposes of delay.

APPROVED AS TO FORM AND CONTENT.

DATED this 6th day of March, 2015.

POTTER LAW OFFICES

By: /s/ Cal J. Potter, III, Esq.
CAL J. POTTER, III, ESQ.
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Attorneys for Plaintiff

DATED this 6th day of March, 2015.

OFFICE OF THE NEVADA ATTORNEY
GENERAL

By /s/ Frederick J. Perdomo, Esq.
ADAM P. LAXALT, Attorney General
FREDERICK J. PERDOMO, Deputy A.G.
Nevada Bar No. 10714
100 North Carson Street
Carson City, NV 89701
Attorney for Defendant Steven D. Grierson

DATED this 6th day of March, 2015.

**LEWIS BRISBOIS BISGAARD &
SMITH, LLP**

By /s/ Robert W. Freeman, Esq.
ROBERT W. FREEMAN, ESQ.
Nevada Bar No. 3062
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*Attorney for Defendants Clark County
and Kathleen Lambermont*

ORDER

IT IS SO ORDERED.

Dated this 9th day of March, 2015.

U.S. DISTRICT COURT JUDGE